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16 December 2015

Via ECF

Honorable Raymond J. Dearie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Leonid Momotok, et al.*
15 Cr. 381 (RJD)

Dear Judge Dearie:

I represent Leonid Momotok in the above-entitled matter. Mr. Momotok is currently out on bail and on home detention with location monitoring in the Northern District of Georgia. On his behalf, I am requesting the Court allow his conditions of release to be modified from home detention to a curfew, restricted to home every day from 10 p.m. to 7 a.m.

Mr. Momotok's unpredictable work schedule as an independent contractor is incompatible with the current supervision in home detention. Additionally, the current restrictions prohibit him from taking his children to school and participating more fully in his church.

I have discussed my request with his Senior U.S. Probation Officer, Donna E. Andrews and AUSA Chris Nasson and they have no objection to this request. If the Court wishes to confirm Ms. Andrews' position, she requested I advise the Court that her last day in the office will be December 22, 2015 after which she will be on leave until the end of the year when she will assume retirement.

Thank you for your consideration.

Respectfully submitted,
/s/ Linda Moreno
Linda Moreno

cc: AUSA Christopher Allen Ott, *Via ECF*
AUSA Chris Nasson, *Via ECF*
PTSO, *Via ECF*